

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

In re M&T Bank Corporation ERISA Litigation

Civil Action No.: 1:16-cv-375-FPG-JJM

Consolidated Action

**PLAINTIFFS' NOTICE OF MOTION AND MOTION TO COMPEL PRODUCTION
OF DOCUMENTS FROM GORDON FEINBLATT LLC**

PLEASE TAKE NOTICE, that Plaintiffs Sa'ud Habib, Beverly Williams, J. Marlene Smith, Kenneth Sliwinski, Russ Dixon and Jacqueline Allen (collectively "Plaintiffs") will and hereby do move this Court for an order to compel Gordon Feinblatt LLC to produce the documents listed on Gordon Feinblatt LLC's privilege log that are identified by the following beginning control numbers: REV0000385, REV0000409, REV0000444, REV0000445, REV0000744, REV0000866; and to produce unredacted versions of the documents listed on Gordon Feinblatt LLC's privilege logs that are identified by the following beginning bates numbers: GF0002788, GF0002860, and GF000286. The grounds for this motion are set forth in Plaintiffs' Memorandum in Support of this motion.

This motion is made based on this Notice of Motion and Motion, Plaintiffs' Memorandum of Law filed with this Notice of Motion and Motion, the Declaration of Jacob Schutz in support of this motion, and all other papers, pleadings, documents, arguments of counsel and materials submitted in this matter, and any other evidence and argument the Court may consider.

Pursuant to Local Rule 7(a)(1), Plaintiffs state they intend to file and serve a reply brief in further support of this Motion.

Dated: September 13, 2019

Respectfully submitted,

By: /s/ Jacob Schutz
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